

whereby claim 56 replaces claim 12. Claims 13-20 and 22 depend directly or indirectly from claim 56. Applicant has amended claims 13-18, 20, 22, 38, and 39.

In the Present Office Action, the Examiner rejected all of the elected claims (*viz.*, claims 1, 12-22, and 36-39), and objected to claims 12-22, 38, and 39 based upon informalities.

#### **Claim Objections**

- The Examiner objected to claim 12 stating that the term “form” appeared to have been deleted by mistake and should be recited in the claim.

Applicant canceled Claim 12, and none of the claims 41-56 have this deficiency..

- The Examiner objected to claim 38 stating that the phrase, “some of the elements comprising said first and second optical arrays” lacks antecedent basis since only the arrays have been recited in claim 1. He further stated that claim 39 inherits the same issue.

Applicant amended claim 38 to provide antecedent basis. Applicant also amended claim 39 to remove dependency from claim 38. Therefore, claim 39 no longer inherits the same issue.

- The Examiner objected to claims 12-22 under 37 CFR § 1.75(c), stating that they were “of improper dependent form for failing to further limit the subject matter of a previous claim. ... Claim 12 which is dependent from claims 1, 36 and 39 describes a method of preparing a hologram to be used as a front projection screen but does not utilize the features that are recited in the independent claim 1, for example, passing diffuse coherent light through first and second optical arrays as shown in Figure 5.”

Applicant introduces a new independent claim 41 along with fifteen dependent claims 42-56. This is being done because claim 1 was originally intended to link all of the claims together into a single unified Application. Due to the restriction/election requirement, many of the elements of claim 1 no longer apply to subcombination II. Applicant wishes to respectfully note that although the scope of claim 41 is narrower than that of claim 1, the reduced scope was made necessary by the required involuntary election, and not to avoid a prior art rejection.

Claim 56 replaces claim 12. Claim 56 depends in a chain from claim 41. The front projection holographic screen of claim 56 is actually the second optical array of claim 41. It appears that the Examiner’s objection to claims 13-22 stem from their dependency on claim 12 that was previously deficient. Applicant believes that the new claims 41-56 should remove this objection from claims 13-22. If Applicant’s belief is not correct, since time still remains for reply, Applicant requests that an advisory action be issued, and Applicant will amend appropriately.

#### **Claim Rejections - 35 U.S.C. § 112 – First Paragraph**

- The Examiner rejected claims 1, 12-22, and 36-39 under 35 U.S.C. § 112 ¶ 1 as failing to comply with the written description requirement. He stated: “The claim(s) contains subject

matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention." The Examiner stated that the claim limitations constitute new matter.

- The Examiner stated:

*In regard to claim 1, the specification does not describe the limitations of "the distances between the centers of focusing means of the second optical array are a multiple of the distances between the corresponding focusing means of the first optical array" or "wherein the focal lengths of the focusing means of the second optical array are the same multiple of the focal lengths of the corresponding focusing means of the first optical array". The "distances" or "focal lengths" are not described in the specification. Claims 36-39 and 12-22 inherit the same issue. These limitations constitute new matter.*

Applicant respectfully disagrees with the Examiner and traverses the Examiner's rejection with the following arguments.

New claim 41 repeats the relationship between the center distances and focal lengths of the focusing means of claim 1. Although the term "focusing means" in claim 1 has been replaced in claim 41 with the term "focusing elements," the relationships of center distances and focal lengths thereof for the first and second arrays has been preserved between claims 1 and 41. It is not intended that claim 41 be interpreted as a means-plus-function claim under 35 U.S.C. § 112, sixth paragraph.

At a personal interview with the Examiner on May 3, 2004, the Applicant presented to the Examiner a document entitled: "PRIORITY INSTRUMENTS (Incorporated By Reference)." A copy of this document (hereinafter referred to as the Visual Presentation) is included with this reply. This document was intended as a visual aid to discuss various technical elements of the Present Application as they relate to priority applications and patents. The Visual Presentation is hereby incorporated by reference in its entirety thereto into this reply.

The Present Application claims priority to and is a continuation-in-part of the Applicant's Non-Provisional Application No. 09/749,984 filed on December 27, 2000 (now US Patent 6,593,958 issued July 15, 2003 -- "the '958 Patent"), which in turn claims priority to and is a continuation of Applicant's Non-Provisional Application No. 09/111,990 filed on July 8, 1998 (now US Patent 6,229,562 issued May 8, 2001 -- "the '562 Patent"), which in turn claims priority to Applicant's Provisional Application No. 60/051,972 filed July 8, 1997. All of the above mentioned applications and patents have been incorporated by reference into the present application.

The Present Application (as well as all of the priority applications and patents) is based upon a disclosed Magnification Principle. When attempts are made to magnify a three-dimensional image of an object or scene, the depth magnification is equal to the square of the lateral magnification. This is undesirable. The inventions described in the Present Application (as well as all of the priority applications and patents) solves the problem by using

the principles of integral photography to enlarge a three-dimensional image uniformly in all three dimensions. Page 2 of the Visual Presentation shows a schematic diagram showing how the Magnification Principle works. An integral photograph is made of an original three-dimensional object using a first optical array comprised of image focusing elements. The integral photograph is enlarged (usually by projection) and then viewed using a second optical array having the same number and arrangement of image focusing elements as the first optical array, except that the second optical array is scaled up from the first optical array by the magnification factor. This allows the enlargement to be uniform. The Applicant has proven experimentally that this principle works. Page 3 of the Visual Presentation quotes the '562 Patent where the Magnification Principle is disclosed. The first paragraph describes that the focal lengths and diameters of the image focusing elements of the second optical array are scaled up from those of the first optical array by the magnification factor. The second paragraph states that the (F/#) remains constant. Page 4 of the Visual Presentation quotes claim 1 of the '562 Patent. The claim discusses that the scaling up process uses the equation for determining the (F/#), and states that the component parts of that equation for the first array are multiplied by the magnification factor to yield the component parts of that equation for the second array. Page 5 of the Visual Presentation shows that the screen is actually the second optical array. Pages 7, 8, and 9 of the Visual Presentation show that the optical arrays can comprise differently shaped focusing elements of different types and in different arrangements. This is shown using drawings taken from the '562 Patent. For a spherical lens focusing element, the (F/#) is the focal length divided by the aperture (or in this case, the diameter of the lens). The '562 patent clearly discloses and claims optical arrays comprised of non-spherical focusing elements. In fact, the screen discussed in claim 12 of the Present Application is shown in Figure 12 and on Page 9 of the Visual Presentation. In the '562 Patent, FIG. 1 shows a system that operates according to the Principle of Magnification and Projection. FIG. 3 shows an array comprising a plurality of cylindrical lenses (a Bonnet Screen). FIG. 7(a) shows an array where the Bonnet Screen is crossed with a single cylindrical lens. FIG. 14 shows a square array comprising a plurality of zone plates. FIG. 15 shows an array where a plurality of linear zone plates is crossed with a single cylindrical lens. FIG. 33 shows a square array of focusing elements comprised of two crossed arrays of cylindrical lenslets. FIG. 34 shows an array comprised of a plurality of small corner cubes. Clearly one can no longer describe the aperture as the diameter of a lenslet, since non-circular lenslets do not have a diameter. In fact, the specification of the '562 Patent provides an additional equation for computing the F-number for an array comprised of a plurality of cylindrical lenslets.<sup>1</sup>

$$\phi_c(F/\#) = f_c$$

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<sup>1</sup> '562 Patent at 25:12

After algebraic manipulation, this equation takes the form of:

$$(F/\#) = \frac{f_c}{\phi_c}$$

where  $f_c$  is the focal length of a cylindrical lenslet, and  $\phi_c$  is the width of the lenslet. Here, the aperture is the width of the lenslet.

The equation to compute the (F/#) of a focusing element is known to those of ordinary skill in the art. Generalization of this equation to cover any focusing means would be apparent to one skilled in the art based upon the foregoing disclosures. The F-number is always the focal length divided by the aperture. For a lenslet of circular cross-section, the aperture is the diameter of the lenslet. To calculate this aperture, it is apparent that the distance between the centers of the lenslets is equal to the diameter for each lenslet. For a cylindrical lenslet, the aperture is the width of the lenslet. To calculate this aperture, it is apparent that the distance between the centers of the lenslets is equal to the width for each lenslet. In the general equation that relates to all of the focusing means described in the '562 Patent, it is apparent that the aperture is the distances between the centers of the focusing means or elements.

Therefore, the limitations in claim 1 and 41 of "the distances between the centers of focusing elements of the second optical array are a multiple of the distances between the corresponding focusing elements of the first optical array" and "wherein the focal lengths of the corresponding focusing elements of the corresponding focusing elements of the first optical array" do not represent new matter, since these limitations were described in the specification and claims of the '562 Patent (incorporated by reference into the Present Application) in such a manner that one skilled in the art can make and use the invention.

The '562 Patent discusses state-of-the-art methods for determining the (F/#) for non-spherical focusing elements (e.g., where the focusing elements are cylindrical lenses each capable of focusing a line of light). All of the different types of focusing elements have a focal length, but the diameter or aperture for a non-spherical element is computed differently. A person of ordinary skill in the art would readily understand that this can be computed (in the general case) as the distance between the centers of the focusing elements. A person of ordinary skill who understands the Magnification Principle disclosed in the patent applications and patents, knowing that the (F/#) between the corresponding focusing elements of the two arrays must remain constant during the scaling up process, would readily understand that the component parts of the equation for determining the (F/#) in the general case would be the focal lengths of the focusing elements and the distances between the centers of the focusing elements, and that the ratios of focal lengths and center distances between the two arrays must be the same (i.e., the scaling ratios must be equal to the magnification factor). It is a geometrically inescapable derivation.

Therefore, once the Magnification Principle is disclosed to one skilled in the art, it would be evident to that person that the Applicant had possession of the invention of claims 1 and 41.

- The Examiner stated:

*Regarding claim 12, the phrase, "spherical wavefront that appears to have been generated at an expected projection distance" is not described in the specification. The term "expected projected distance" is not described in any way. Also, the phrase, "said focal distance being calculated based upon the distance between the line of light and an adjacent line of light" is not described in the specification. Claims 13-22 inherit the same issue. These limitations constitute new matter.*

Original claim 12 (submitted when the Present Application was filed) recited: *"the reference beam has a spherical wavefront that appears to have been generated at a reasonably large distance... ."* The specification at paragraph [0054] of the Specification (US Patent Application Publication US 2001/0028485 A1 published on October 11, 2001) states: *"Should the reference beam emanate from a projector in the rear of the theater with an image of the integral photograph impressed on the beam such that the image of the integral photograph is focused onto the screen, then a 3-dimensional image will be reconstructed from the integral photograph."* The reconstructing reference beam must have the same waveform as the recording reference beam for reconstruction to occur properly. This is known from the basics of holography. Therefore, the recording reference beam must be such that it appears to have been generated from a projector in the rear of the theater. This is what is meant by "reasonably large distance." Accordingly, this is what is meant by "expected projected distance." However, to clarify the meaning of what is claimed, the Applicant has recited "a desired projection distance" instead of "an expected projection distance."

- The Examiner stated:

*Regarding claim 38, there is no description in the specification of the recitation of "the remaining elements are comprised of other types of optics". Claim 39 inherits the same issue. This limitation constitutes new matter.*

Claim 38 has been amended to recite:

38. *The method of claim 36 or 37 wherein said coordinated and complementary set of holograms comprises other types of optics.*

With regard to the "new matter" rejection, the Applicant refers the Examiner to the first sentence of paragraph [0039] of the Specification which states: *"Holographic imaging devices can be used with more-or-less standard, inexpensive lenses to accomplish all projection functions."* That paragraph then provides examples.

Applicant has amended claim 39 to remove its dependency from claim 38. Therefore, claim 39 no longer inherits the same issue.

**Claim Rejections - 35 U.S.C. § 112 – Second Paragraph**

The Examiner rejected claims 12-22 and 39 under 35 U.S.C. § 112 ¶ 2, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

- The Examiner stated:

*Regarding claim 12, the phrase, "spherical wavefront that appears to have been generated at an expected projection distance" is vague and indefinite. The term "expected projection distance" is unclear since the meaning of "expected" is a relative term. Also, the phrase, "said focal distance being calculated based upon the distance between the line of light and an adjacent line of light" is unclear as to the meaning of a line of light and an adjacent line of light. Claims 13-22 inherit the same issue.*

Claim 12 was canceled, and claim 56 recites "a desired projection distance" instead of "an expected projection distance." The reason for this substitution was explained above. It has always been the case that the creator of the holographic screen should be able to select the projection distance based upon theater requirements. This is evident from the Specification.

New claims 50-56 clarify the meaning of a "line of light" and an "adjacent line of light." The production of monochromatic lines of light is clear from Figure 12 which is a top plan view of the reconstructions of the front projection screen. Paragraph [0054] of the Specification states:

*The method of reconstruction is shown in FIG. 12. A white light reference beam with a spherical wavefront is used to reconstruct alternating red, green and blue cylindrical wavefronts. Should the reference beam emanate from a projector in the rear of the theater with the image of the integral photograph impressed on the beam such that the image of the integral photograph is focused onto the screen, then a 3-dimensional image will be reconstructed from the integral photograph.*

Figure 12 shows the rays of light converging to adjacent points that form an alternating series of red, green, and blue. However, the front elevational view would show adjacent parallel lines of light since cylindrical wavefronts are reconstructed. The original claim 12 recited the technical details of this very same situation.

- The Examiner stated:

*Regarding claim 39, the phrase "a hologram" is vague and indefinite since it is unclear whether "a hologram" is an additional element or the same hologram recited in claim 1. Claims 12-22 inherit the same issue*

The Applicant has amended claim 39 to remove the indefinite reference. Claim 43, depending from claim 41 has a parallel structure to claim 39. However, in claim 43, "the second optical array" is recited instead of "the hologram." Therefore, neither claims 44-56 nor claims 13-20, 22 have this problem.

#### **Claim Rejections - 35 U.S.C. § 102**

The Examiner rejected claims 1, 12-22 and 36-39 under 35 U.S.C. § 102(b) as being anticipated by McGrew US Patent 4,421,380 (hereinafter McGrew). McGrew was the only prior art cited as grounds for rejection of the claims.

- The Examiner states:

*In regard to claim 1, McGrew teaches (see for example, Figures 3, 4, 6, 7) a method for making a coordinated and complementary set of holograms comprising at least one hologram, to be used in a system for recording and projecting three-dimensional images, wherein said three-dimensional images are magnified uniformly in all dimensions by a magnification factor, said method comprising: producing a recording reference beam by passing diffuse coherent light from a coherent light source (441) through a first optical array (350) containing a plurality of image focusing means therein, and producing an object beam by passing diffuse coherent light from the same coherent light source through a second optical array (480) containing a plurality of image focusing means therein of the same number and arrangement of the first optical array, a) wherein the distances between the centers of the focusing means of the second optical array are a multiple of the distances between the corresponding focusing means of the first optical array, said multiple being equal to the b) magnification factor, and, wherein the focal lengths of the corresponding focusing means of the first optical array as described in column 4, lines 40-68, column 5, lines 1-66 and column 6, lines 1-44 as understood by the current claim language.*

The Applicant respectfully disagrees with the Examiner, and offers the following traversing arguments.

In order to establish a *prima facie* case of anticipation, the Examiner must provide a single reference that teaches or enables each of the claimed elements (arranged as in the claim) expressly or inherently as interpreted by one of ordinary skill in the art. In this case, the Examiner repeated claim 1 of the Present Application with annotations indicating where he believes McGrew reads on the claim. He refers to element 441 which is a coherent light source. He next refers to element 350 as a first optical array containing a plurality of image focusing means therein. However, McGrew teaches that element 350 is a color filter array and not an optical array containing a plurality of image focusing means therein. (See column 5, lines 10 and 18-21.) The Examiner then refers to element 480 as a second optical array containing a plurality of image focusing means therein of the same number and arrangement as the first optical array. Once again, McGrew teaches that element 480 is also a color filter array and not an optical array containing a plurality of image focusing means therein. Furthermore, he does not teach anything regarding the relationship of the number and arrangement of elements of color filter 480 with respect to color filter 350. (See column 5, lines 52-68 through column 6, lines 1-3.)

What McGrew teaches in his disclosure (the specification and figures), and particularly in Figures 3, 4, 6, and 7 as well as in his specification at columns 4-6 is the following. McGrew initially produces a motion picture film consisting of two-dimensional picture frames of a given scene. The subject matter of this motion picture film is then used to produce a color hologram viewable in white light. Nowhere does he mention nor teach that the reconstruction is a three-dimensional image that is magnified uniformly in all dimensions by a magnification factor. He merely states:

*The present invention combines the principles of white-light viewable Benton-type holograms and color mosaic holograms with the principles of achromatic holograms to produce white-light viewable, full-color hologram with extended viewing aperture and extended image depth.*<sup>2</sup>

Uniform magnification of a three-dimensional image upon reconstruction was unanticipated by McGrew in his disclosure, and was not taught. It cannot be considered as prior art for this rejection.<sup>3</sup> McGrew makes a composite hologram consisting of individual holograms each of a different frame of the two-dimensional motion picture film. Each individual hologram reconstructs a two-dimensional picture. The composite hologram can possibly reconstruct a three-dimensional scene much like an integral photograph. In fact, McGrew's composite hologram is often referred to as an integral hologram. This technology is not new. It was practiced by Lloyd Cross as early as 1970. The unique contribution of McGrew is his teaching of how to make a full color integral hologram. He does not anticipate claim 1 of the Present Application.

Claim 1 of the Present Application recites a specific relationship between two optical arrays. More specifically, it recites that the focal lengths AND the distances between centers of the focusing elements (the components of the equation for  $F/\#$ ) of the second optical array are specified by multiplying the focal lengths AND center distances of the elements of the first optical array by the same magnification factor. This is the basic principle of magnification and projection taught in the Present Application and in the patents and applications to which the Present Application claims priority. Nowhere does McGrew teach or claim these elements.

Therefore, the Applicant asserts that the Examiner has failed to make a *prima facie* case for rejection of claim 1 under 35 U.S.C. § 102(b) as being anticipated by McGrew, and respectfully requests that the Examiner reverse his rejection of claim 1 and allow the claim.

Independent claim 41 is new, and therefore, unexamined. However, it possesses a parallel structure to claim 1 even though its scope is narrower. For the same reasons that McGrew does not anticipate claim 1, it cannot anticipate claim 41.

- The Examiner next rejects dependent claims 12-22 and 36-39 under 35 U.S.C. § 102(b) as being anticipated by McGrew. The dependent claims to be considered are now 13-20, 22, 39-36, and 42-56. Claims 39-36 depend from claim 1. They incorporate all of the elements of claim 1 and recite additional limitations. If claim 1 is not anticipated by McGrew, claims 39-36 cannot be anticipated by McGrew. Furthermore, claims 42-56, 13-20, and 21 depend from claim 41. If claim 41 is not anticipated by McGrew, claims 42-56, 13-20, and 21 cannot be anticipated by McGrew.

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<sup>2</sup> McGrew Column 3, lines 4-9

<sup>3</sup> "Accidental results, not intended and not appreciated, do not constitute anticipation in the Patent Law.", Eibel Process Co. v. Minnesota & Ontario Paper Co., US Supreme Court, 261 U.S. 45, 66, 43 S.Ct. 322, Decided: 02/19/1923.



- Regarding claim 36, the Examiner states that McGrew teaches that the composite hologram is comprised of a plurality of holograms. This is true. However, McGrew makes individual holograms of two-dimensional pictures. The Present Application teaches the fabrication of holographic focusing elements having a specified relationship between two optical arrays to accomplish uniform magnification of three-dimensional images from an integral photograph. McGrew creates the integral hologram. The Present Application creates a holographic optical element that can magnify the three-dimensional image captured by an integral photograph.
- Regarding claim 39, the Examiner states that McGrew teaches that a hologram is prepared by exposing portions of a photographic plate incrementally until the entire hologram is produced. While this is true, incremental exposure to produce a composite hologram, in of itself, is not novel technology. However, using it to produce holographic focusing elements having the specific relationship between first and second optical arrays so as to enable uniform magnification of three-dimensional images is novel.
- Regarding claim 12, the Examiner states that McGrew teaches making the front projection holographic screen for reconstructing magnified 3-dimensional images projected from unmagnified integral photographs or holograms. This is not so. McGrew teaches the making of a specific type of integral photograph (*i.e.*, an integral hologram that reconstructs a color image when illuminated with white light). Although claim 12 has been canceled, claim 56 inherits all of its issues. Claim 56 teaches making the same screen and by the same method as claimed in canceled claim 12. The composite holograms are different. Comparing the Present Application to McGrew is like comparing a specific three-dimensional picture to a screen that reconstructs a large number of three dimensional pictures. McGrew creates a hologram of a scene. The Present Application creates a holographic optical element.
- Regarding claims 13 and 14, the Examiner points out that McGrew teaches that the reference and object beams may impinge either on the same side or on opposite sides of the photographic plate. This is not a unique teaching to McGrew. However, in the Present Application, it represents additional alternative limitations of claim 56 which incorporates all of the limitations of claims 55, 54, 53, 50, 49, 48, 47, 44, 43, and 41.
- Regarding claims 15 and 16, the Examiner points out that McGrew teaches repositioning of either the object beam or the photographic plate between successive holographic exposures. This is not the case. McGrew only teaches repositioning of the photographic plate. However, even this is not new. Incremental exposure as described in the Present Application requires some form of relative repositioning. This is known in the art. Claims 15 and 16 only serve to further limit claim 56.
- Regarding claim 17, the Examiner points out that McGrew teaches that the wavelengths of the three monochromatic lasers can be roughly characterized as red, blue, and green. While this is true, these three additive primary colors have been used to produce color pictures for

over a century. The Present Application uses them as an additional limitation on claim 56 to produce color pictures from black-and-white. In this case, it is necessary to provide sufficient resolution for reconstruction of three-dimensional color images. Black-and-white film has a greater resolving power than color film. Therefore, this limitation on claim 56 has the unexpected benefit of producing color images of higher resolution than were color film to be used.

- Regarding claim 18, the Examiner points out that McGrew teaches that the wavelengths of the three monochromatic laser beams are all components of a single laser capable of producing white coherent laser light. This is not true. McGrew uses a combination of helium-cadmium, helium-neon, and argon ion lasers to produce his multi-color coherent light.<sup>4</sup>
- Regarding claim 19, the Examiner points out that McGrew teaches that the laser used is a krypton laser. The Applicant has reviewed the entire patent and is unable to find where McGrew specifically teaches the use of a krypton laser. The Applicant would appreciate it if the Examiner would point out the specific reference.
- Regarding claim 20, the Examiner points out that McGrew teaches that the reference is a spherical wavefront comprised of several or all of the wavelengths produced by the white laser. As pointed out previously with respect to claim 18, McGrew does not use a white light laser. He uses multiple lasers to create a single coherent light beam which may produce white light. As far as the use of a white light spherical wavefront reference beam, this is standard practice, and it represents a further limitation on claim 18.
- Regarding claim 21, the Examiner's arguments are moot since the claim was canceled. However, the Applicant respectfully disagrees with the Examiner when he states that McGrew teaches that the distance that each real image of the line of light used in the object beam is from the photographic emulsion is the focal length required for the particular wavelength of monochromatic light used to produce its portion of the hologram. The Applicant cannot find any reference to this teaching. The Applicant would appreciate it if the Examiner would point out the specific reference.
- Regarding claim 22, the Examiner states that McGrew teaches that the hologram is comprised of holograms produced as identical rectangular tiles, and the hologram is produced by assembling the tiles. The Applicant respectfully disagrees with the Examiner. McGrew produces rectangular holographic elements and not tiles. However, even if the holographic elements are considered as tiles, they are not identical. Each one is different as it is prepared from a different frame of the motion picture film.
- Regarding claim 37, the Examiner points out that McGrew teaches that the coordinated and complementary set of holograms is a single hologram. The Applicant respectfully disagrees

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<sup>4</sup> McGrew Column 6, lines 6-14

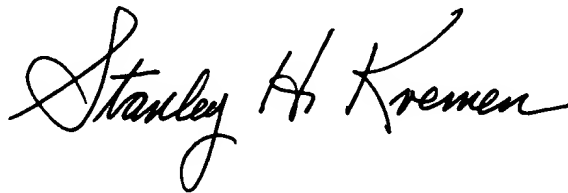
with the Examiner. McGrew teaches that it is an integral hologram (comprised of a large number of small holograms) and not a single hologram.

- Regarding claim 38, the Examiner points out that McGrew teaches that some of the elements comprising said first and second optical arrays are holograms and the remaining elements are comprised of other types of optics. The applicant cannot determine whether or not the Examiner's statement is true, since it is not clear what the Examiner means when he discusses McGrew's teaching of first and second optical arrays. However, even were this statement to be true, claim 38 depends from claims 36 or 37, which, in turn, depend from claim 1. If claim 1 is not anticipated by McGrew, claims 36, 37, and 38 cannot be anticipated by McGrew.

Considering the traversing arguments stated above, and the dependency of claims 36-39 from claim 1 (which is not anticipated by McGrew) and of claims 13-20, 22, and 43-56 from claim 41 (which is not anticipated by McGrew), the Applicant asserts that the Examiner has failed to make a *prima facie* case for rejection of dependent claims 13-22 and 36-39 under 35 U.S.C. § 102(b) and being anticipated by McGrew, and respectfully requests that the Examiner reverse his rejections of these claims.

Based upon all of the above arguments, the Applicant respectfully requests that the Examiner allow all claims of the Present Application.

Respectfully submitted,

A handwritten signature in black ink that reads "Stanley H. Kremen". The signature is written in a cursive, flowing style with a large initial 'S'.

Stanley H. Kremen,  
Applicant